

1 The Honorable James L. Robart
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

The Honorable James L. Robart
United States District Judge

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NORTHWEST IMMIGRANT RIGHTS
PROJECT, *et al.*,

Plaintiffs,

v.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES, *et al.*,

Defendants.

Case No. 2:15-cv-00813-JLR
STIPULATION AND ~~PROPOSED~~ ORDER
FOR AN EXTENSION

NOTE ON MOTION CALENDAR:
August 31, 2022

The Government requests an extension of the deadlines for filing the response and reply with respect to Plaintiffs' pending Motion for Civil Contempt and to Enforce Permanent Injunction currently noticed for September 9, 2022 (Dkt. #196). Specifically, the Government requests that its deadline to file a response to the Motion for Civil Contempt be extended until September 12, 2022 and, accordingly, that the Plaintiffs' deadline to file a reply be extended until September 16, 2022.

The Government maintains that good cause is shown for the extension. The Government represents that it has been working diligently to prepare its response to the Motion for Civil Contempt but needs additional time to prepare a declaration in support of its response due to the

1 fact that the declarant is currently out of town. The Government asserts that the additional time
2 will ensure that the response is thorough and comprehensive.

3 Therefore, the parties agree that the Government will file its response to Plaintiffs'
4 Motion for Civil Contempt on September 12, 2022, and that Plaintiffs will file their reply by
5 September 16, 2022.

6 Dated this 31st day of August 2022.

7 By: *s/ Emma C. Winger*
8 Emma C. Winger (*pro hac vice*)
9 American Immigration Council
*1331 G Street, NW, Suite 200
Washington, DC 20005
10 (202) 507-7512
11 *Not admitted in D.C. Practice limited to
federal courts.

12 Matt Adams, WSBA No. 28287
13 Northwest Immigrant Rights Project
615 Second Avenue, Suite 400
14 Seattle, WA 98104
(206) 957-8611

15 Devin Theriot-Orr, WSBA 33995
16 Open Sky Law, PLLC
20415 72nd Ave. S., Ste. 110
17 Kent, WA 98032
(206) 962-5052

19 Marc Van Der Hout (*pro hac vice*)
20 Johnny Sinodis (*pro hac vice*)
21 Van Der Hout, LLP
180 Sutter Street, Suite 500
22 San Francisco, CA 94104
(415) 981-3000

23 Robert H. Gibbs, WSBA 5932
24 Robert Pauw, WSBA 13613
25 Gibbs Houston Pauw
1000 Second Avenue, Suite 1600
Seattle, WA 98104-1003
(206) 682-1080

Scott D. Pollock (*pro hac vice*)
Christina J. Murdoch (*pro hac vice*)
Kathryn R. Weber (*pro hac vice*)
Scott D. Pollock & Associates, P.C.
105 W. Madison, Suite 2200
Chicago, IL 60602
(312) 444-1940
Counsel for Plaintiffs

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General
Civil Division

WILLIAM C. PEACHEY
Director
Office of Immigration Litigation
District Court Section

JEFFREY S. ROBINS
Deputy Director

By: s/Aaron S. Goldsmith
Aaron S. Goldsmith
Senior Litigation Counsel
United States Department of Justice
Civil Division
Office of Immigration Litigation
District Court Section
Washington, D.C. 20044
Tel.: (202) 532-4107
Email: aaron.goldsmith@usdoj.gov

Counsel for Defendants

ORDER

The parties having so stipulated, IT IS ORDERED that the stipulation is granted. The parties will comply with the deadlines set forth above. The Clerk is directed to remote Plaintiffs' motion for contempt and to enforce permanent injunction (Dkt. # 196) on September 16, 2022.

Dated this 31st day of August, 2022.



John P. Blunt

James L. Robart
United States District Judge